

1 set up.

2 Q On a yearly basis?

3 A That is the way it was set up, on a yearly
4 basis.

5 Q And what does the Board do when it meets?

6 A We go through the yearly, all of the yearly
7 earnings, and any problems we have had we go through
8 that, and suggestions are made, and just a general
9 Board, a Board meeting.

10 Q And has that pattern been consistent from the
11 time, or you know from the present on back to the time
12 when the corporation was formed?

13 A Yes.

14 Q Now the corporation was formed when? In
15 about late 1986 or early 1987?

16 A Eighty-seven, I believe.

17 Q Okay. This was prior to the time the
18 construction permit application was filed. Correct?

19 A Yes.

20 Q And the corporation was organized by whom?

21 A By Don Stewart.

22 Q And did you have any role in the organization
23 of the corporation?

24 A Yes.

25 Q And what role was that?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A Well, I operated as secretary of it.

2 Q Okay. But in terms of actually getting the
3 corporation started, other than being named as
4 secretary, did you have any role?

5 A Just as a supporter of my husband. That's
6 all.

7 Q Now prior to the operation of KOKS, did you
8 have any involvement in the management or operation of
9 an FM radio station?

10 A No.

11 Q Prior to the operation of KOKS, what
12 experience, if any, did you have with the phenomenon
13 known as blanketing interference?

14 A None.

15 Q Could you give us a description, a brief
16 description, of your work experience before KOKS began
17 operating?

18 A We were farmers. We worked on the farm, in
19 livestock and also with the layer operations.

20 Q In?

21 A In the layer operation, as my husband said
22 yesterday. Just general work on the farm.

23 Q Okay. The layer operations?

24 A Yes, I kept the books.

25 Q The laying, the chickens laying eggs?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A Right. Yes, sir. I also did keep the books
2 for the farm.

3 Q You did?

4 A Yes.

5 MR. DUNNE: Excuse me, Counsel. Mrs.
6 Stewart, would you be sure to keep your voice up? It
7 is kind of loud on this side.

8 THE WITNESS: All right.

9 MR. DUNNE: Excuse me for interrupting.

10 BY MR. SHOOK:

11 Q Now, Mrs. Stewart, did you have any role in
12 choosing the site for the KOKS tower?

13 A Yes.

14 Q And what role was that?

15 A My husband and I discussed it, and we had the
16 property there. There was enough room. They said you
17 had to have a tower site first before you could file
18 for a construction permit or even file for a -- see if
19 there was an open window. And there was two towers
20 already in the neighborhood, and we felt by that that
21 there should not be any problems with constructing a
22 tower there. And there was no zoning laws, so we had
23 no idea that there would be any problem whatsoever.

24 Q Okay. So you weren't going to have any
25 problem relative to zoning because there weren't any

FREE STATE REPORTING, INC.

Court Reporting Depositions

D.C. Area 261-1902

Balt. & Annap. 974-0947

1 zoning laws?

2 A Yes.

3 Q When you mentioned "they said," who were the
4 "they" that you were referring to?

5 A They said?

6 Q You started your testimony by mentioning,
7 "They said," and then you continued on.

8 A Oh, Kevin Fisher told us that we would have
9 to have a tower site first. They had to have that to
10 see if there was an open window. You had to have your
11 location of your tower site first.

12 Q These, the conversation -- or was there more
13 than one conversation with Kevin Fisher?

14 A Yes.

15 Q And over what period of time? You know, when
16 you first began to think about putting up a radio
17 station to the time the construction permit application
18 was filed, how many discussions did you have with Kevin
19 Fisher?

20 A Probably six.

21 Q Were any of these face to face, or were they
22 all over the telephone?

23 A All over the telephone.

24 Q Now has Mr. Fisher ever been to Poplar Bluff?

25 A Not to my knowledge.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q Did you have any role in supplying Mr. Fisher
2 with maps of this area?

3 A No.

4 Q Do you know how Mr. Fisher came to have maps
5 in his possession?

6 A No, I don't.

7 Q Okay.

8 MR. SHOOK: Now I want to place before the
9 witness an exhibit, Your Honor.

10 JUDGE STIRMER: Very well.

11 BY MR. SHOOK:

12 Q Now, Mrs. Stewart, I have placed before you
13 Mass Media Exhibit No. 12. Now why don't you take a
14 brief look through it? Just so that you know, it
15 consists of 12 pages.

16 (Pause.)

17 Q Okay. Have you had a chance to look through
18 it?

19 A Yes.

20 Q Okay. You recognize, do you not, that this
21 is not the entire construction permit application?

22 A Yes.

23 Q But you do recognize it as having parts of
24 the construction permit application?

25 A Yes.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q Mrs. Stewart, I would first direct your
2 attention to page 3. Now can you tell us who the
3 individuals Ken Pressin and Joseph Scobey are?

4 A Yes. I had forgotten. They started out as
5 on the Board also.

6 Q And how long did those individuals stay on
7 the Board?

8 A Mr. Pressin stayed on for a few, just a few
9 short months. He moved to Baton Rouge, Louisiana.

10 Q And was he replaced by someone?

11 A He was replaced by Dale Vermillion.

12 Q And how about Mr. Scobey?

13 A Mr. Scobey stayed on for about six months,
14 about six months or so.

15 Q And what happened after that?

16 A That's when Alan Teserau, I think, came on
17 the Board.

18 Q Okay.

19 A There might have been a few months difference
20 in there. You know, it is hard to remember just
21 exactly the date.

22 Q Okay. And I would like to direct your
23 attention to page 5?

24 A Page 5? Yes.

25 Q Now do you recognize the signature that

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 appears there?

2 A Yes.

3 Q And that signature is whose?

4 A Don Stewart's, Donald Stewart.

5 Q And it is your understanding, or do you have
6 personal knowledge that he actually signed the
7 application?

8 A That looks like his signature.

9 Q Okay. Well, my question is, do you know
10 whether he actually signed it?

11 A I don't remember if I was there when he
12 signed it or not. I don't know.

13 Q Okay. But it is your understanding that he
14 did sign it and that is his signature?

15 A Yes.

16 Q Now, if you would, please, turn to page 7.

17 A All right.

18 Q Do you recognize the map that appears here?

19 A Yes.

20 Q Do you know how this map came to be
21 incorporated into the application?

22 A No. I just suppose Kevin Fisher put it in
23 there. I don't know.

24 Q Okay. Now, Mrs. Stewart, I ask you to turn
25 to page 12.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A Twelve?

2 Q Could you read Question 24 and the answer?

3 A Do you want me to read the answer, you say?

4 Q Read the question and the answer.

5 A Oh. "If the proposed antenna location is in
6 or near a populated area, past exhibit number, a
7 discussion of blanketing and the steps proposed to
8 remedy any interference which may occur." The answer
9 says, "Does not apply."

10 Q Now do you have any knowledge as to why the
11 answer "Does not apply" was given for that question?

12 A No.

13 Q Did you have anything to do with the
14 preparation of the answer to that question?

15 A No.

16 Q Can you tell us who did?

17 A I do not know.

18 Q Other than the fact that Kevin Fisher's name
19 appears at the bottom, you wouldn't have any knowledge
20 as to how that answer came to be there?

21 A No.

22 Q Before yesterday, did you have any knowledge
23 that Question 24 was answered in the fashion "Does not
24 apply"?

25 A No.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q Now the property that serves as KOKS's tower
2 was owned by you and your husband prior to August of
3 1988. Correct?

4 A Yes.

5 Q And in August of 1988, what happened to the
6 ownership of the property?

7 A It was transferred to Calvary.

8 Q So Calvary owns your house?

9 A Yes.

10 Q Does anyone live at that house besides you
11 and your husband?

12 A Our son.

13 Q You and your son and your husband?

14 A That's right.

15 Q Okay. Who is your son? What is his name?

16 A Ben. Ben Stewart.

17 Q Does Ben Stewart have anything to do with the
18 operation of the radio station?

19 A He works 15 hours a week.

20 Q In what capacity?

21 A As a deejay. As a deejay.

22 Q He has a regular air shift?

23 A Yes.

24 Q And what are his working hours?

25 A Saturday, eight hours; Sunday, seven hours.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q And does he have anything else to do with the
2 radio station?

3 A No.

4 Q And how long has he worked as a disc jockey
5 at the radio station?

6 A About two years.

7 Q And prior to that time, did he have anything
8 to do with the operation of the radio station?

9 A No.

10 Q Now, Mrs. Stewart, in the first paragraph of
11 your testimony, specifically the sentence that was
12 corrected this morning?

13 A Yes.

14 Q Now the \$195,000 figure, is that supposed to
15 be an annual figure?

16 A Yes.

17 JUDGE STIRMER: Let me backtrack a moment,
18 Mr. Shook. Mrs. Stewart, would you say your house is
19 in or near a populated area?

20 THE WITNESS: There's neighbors around. We
21 have seven and a half acres, and the neighbor at the
22 side of us has about 20 acres with two houses on it,
23 and the one behind us has about 10 acres with one house
24 on it.

25 JUDGE STIRMER: How many houses would you say

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 are located within a two-mile area of your house?

2 THE WITNESS: I would not have the least
3 idea, sir.

4 JUDGE STIRMER: You don't know?

5 THE WITNESS: No, sir.

6 JUDGE STIRMER: All right. Excuse me,
7 Mr. Shook.

8 MR. SHOOK: Yes, Your Honor.

9 BY MR. SHOOK:

10 Q Now the income figure here of \$195,000, that
11 is supposed to be the maximum income that the station
12 has ever had?

13 A Yes.

14 Q And that would be for years, what? 1988?
15 1989?

16 A Not '88, no. We only operated in October,
17 November and December of '88.

18 Q Okay.

19 A So that figure was way down there.

20 Q Right. Let me backtrack and make this a
21 little clearer. The \$195,000 figure, that is a 12-
22 month figure? Correct?

23 A Yes.

24 Q And do you have -- the fiscal year that you
25 used that is different from the calendar year?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A No.

2 Q Okay. Your fiscal year is the calendar year?

3 A Yes.

4 Q Okay. Do you have any knowledge as to what
5 the income for the station was beginning with calendar
6 year 1988?

7 A Eighty-eight? The first three months,
8 approximately \$36,000.

9 Q And then for calendar year 1989?

10 A I don't know. Right off the top of my head,
11 I don't know.

12 Q How about calendar year 1990?

13 A I don't know. Really, I couldn't. I can't
14 give you an exact figure.

15 Q Okay. Can you give me an approximate figure?

16 A Approximately \$195,000.

17 Q Okay. Is the \$195,000 relatively consistent?

18 A Yes.

19 Q You have been able to raise that much money
20 approximately each of the full calendar years that you
21 have been on the air?

22 A Yes.

23 Q I understand the contributions aspect. What
24 rental income does the station have?

25 A The FBI rents space on the tower, and also a

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 | paging company, Cellular Phone, rents space on the
2 | tower.

3 | Q And when did the FBI start to rent space on
4 | your tower?

5 | A Oh, in about the first of '89, I guess.
6 | Somewhere in '89.

7 | Q Okay.

8 | A In the year of 1989.

9 | Q And then what is it? A paging company? Is
10 | that what you said?

11 | A It's Cellular Phone.

12 | Q Cellular Phone?

13 | A Uh-huh. It started about four months ago.

14 | Q Now Mr. Stewart yesterday made reference to a
15 | salary of \$160 per week, and I notice that appears in
16 | the last sentence of your testimony. Is that what he
17 | was referring to when he was talking about your income
18 | of \$160 per week?

19 | A No, he was talking about prior to working at
20 | the radio station, I believe, if I understood him
21 | correctly.

22 | Q Okay. And what income would he have been
23 | referring to? Do you know?

24 | A I was working at a job making \$160 a week.

25 | Q And you continued with that job until you

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 started to work full time for the radio station?

2 A Yes.

3 Q Now prior to the time KOKS began to operate,
4 can you tell us what systems you had in your household
5 for watching television?

6 A We had a satellite.

7 Q And when did you have a satellite? When was
8 the satellite installed?

9 A It was there when we moved there in 1985.

10 Q And how many of your televisions are
11 connected to -- I mean, assuming that you have more
12 than one television, how many televisions do you have
13 connected to the satellite?

14 A When we moved there, there was two. Right
15 now we just have the one.

16 Q Okay. Were both of the televisions connected
17 to the satellite?

18 A Yes.

19 Q And now you have one television connected to
20 the satellite?

21 A Yes.

22 Q Did you have a means for watching television
23 off the air, or you watched exclusively by the
24 satellite?

25 A We did not have an outside antenna. The

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 gentleman that we bought the place from said that he
2 did not put up an outside antenna because TV reception
3 was very sorry, and so he had a satellite and he just
4 watched satellite.

5 Q He just watched satellite?

6 A And there was no antenna installed.

7 Q Uh-huh. Now backtracking a little bit, when
8 the construction permit application was prepared, and
9 prior to the time the FCC granted the construction
10 permit application, do you recall ever discussing with
11 Mr. Fisher blanketing interference?

12 A No.

13 Q Was blanketing interference ever a topic of
14 discussion between you and Mr. Fisher from the time the
15 construction permit was granted until the station went
16 on the air?

17 A No.

18 Q Now prior to October of 1988, and I will use
19 that pretty much as the starting point for when the
20 station began operations, had you ever been to the home
21 of Doris and Paul Smith?

22 A No.

23 Q What conversations, if any, had you had with
24 them prior to October of 1988?

25 A Just seeing them, waving and saying "Hi."

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q Did you have any conversations with them
2 relative to the proposed radio station that was going
3 to, you know, be put on your property?

4 A No.

5 Q Now, Mrs. Stewart, I would like to refer you
6 to paragraph 4 of your testimony. Do you see the
7 second-to-the-last sentence that reads, "One of our
8 Board members, Carl Clanahan," etc."

9 A Yes.

10 Q Now did Dr. Clanahan speak to you?

11 A Yes.

12 Q And how many times did he call you relative
13 to the information that appears in that sentence?

14 A Just the one time that I remember.

15 Q Did he identify any of the people who had
16 supposedly called him?

17 A No.

18 Q Did he explain what the nature of these
19 individuals' complaints were?

20 A He just said they were complaining that the
21 radio station was interfering with their TV reception.

22 Q Okay. Did he go into any detail about what
23 kind of interference this supposedly was or how it
24 appeared on the television?

25 A No.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q Okay. On April 1, 1988, did Mrs. Smith speak
2 with you?

3 A I believe Mrs. Smith spoke to Mr. Stewart, as
4 I recall.

5 Q Okay. She did not speak to you?

6 A No.

7 Q Mrs. Stewart, I am going to refer to
8 paragraph 5 of your testimony. The second sentence
9 reads, "Pretty soon after going on the air," etc. Now
10 how many telephone calls came in on that day?

11 A I don't know, 10, 12.

12 Q Were you the only person who was answering
13 these calls, or were there other people?

14 A I don't remember, really. I don't remember.
15 It seemed like there was other people there, but I
16 don't know if anyone else answered the phone or if it
17 was just me.

18 Q Okay. So in other words, you were receiving
19 the telephone calls that are mentioned here?

20 A Yes.

21 Q Did the individuals in question describe in
22 any way what the interference was that they were
23 supposedly receiving from your radio station?

24 A As I recall, they just said that we were
25 messing up their TV.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q Okay. Did they identify which channel or
2 channels were being affected?

3 A Channel 6 was mentioned.

4 Q And what was mentioned relative to Channel 6?

5 A That we were coming in on the audio.

6 Q Was anything else said?

7 A That we were blanking out the screen, the
8 picture from Paducah, and KOKS was coming in.

9 Q Okay. Were any complaints made relative to
10 the reception of any of the other channels?

11 A No.

12 Q Now beginning with the fourth sentence, it
13 says, "There were a few people who did identify
14 themselves." And then you have in the next two
15 sentences, there are four persons named: Mrs. Smith,
16 Marie Christian, Dairrel Denton and Randy Soens. By a
17 "few people" and then the persons who are named, are
18 you saying that it was just those four people who
19 identified themselves, or there may have been others
20 and you don't remember?

21 A At that time, this is the only four that I
22 remembered. These are the only four names that I
23 recall.

24 Q These four? All right. And these four
25 actually spoke to you?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A Yes.

2 Q And do you recall what each of the
3 individuals complained about? And we can take it one
4 at a time. Do you remember what Mrs. Smith complained
5 about?

6 A Channel 6.

7 Q Okay. Was Mrs. Smith's complaint limited to
8 Channel 6?

9 A At that date, yes.

10 Q Now did there come a time, or are you saying
11 that there came a time when Mrs. Smith's complaints
12 weren't limited to Channel 6?

13 A Yes.

14 Q And what period of time elapsed before the
15 nature of her complaints changed?

16 A I don't recall the exact period of time.

17 Q Can you give us an approximation?

18 A Three weeks. Two weeks, three weeks.

19 Q And how about Marie Christian?

20 A Marie? Hers was Channel 6, she said.

21 Q And did Marie Christian complain about any
22 other channel?

23 A Not at that time, no.

24 Q Did there come a time when she complained
25 about channels other than Channel 6?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

- 1 A Yes.
- 2 Q And approximately how much time was that?
- 3 A I would say probably within a three-week
- 4 period. Now that's just -- I can't be exact with the
- 5 date on it.
- 6 Q Right. No, I recognize that this is an
- 7 approximation.
- 8 A Right.
- 9 Q And how about Mr. Denton?
- 10 A Mr. Denton at the time told me that it was
- 11 Channel 6.
- 12 Q And did there come a time when the nature of
- 13 Mr. Denton's complaints changed?
- 14 A Yes.
- 15 Q And approximately how much time was that?
- 16 A I would say probably three weeks. Two weeks
- 17 or three weeks, somewhere in that first two to three
- 18 weeks.
- 19 Q And how about Mr. Soens?
- 20 A Same there.
- 21 Q Now in your testimony there is an attachment.
- 22 If you would refer to it, please. An attachment from
- 23 the FCC. It is a letter dated October 21, 1988.
- 24 A Yes.
- 25 Q Now did there come a time when this letter

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 was brought to your attention?

2 A Yes.

3 Q And could you tell us approximately when that
4 occurred?

5 A Probably in -- let's see. She has dated it
6 October the 21st, which we didn't get it for
7 approximately a week after that, knowing the mail. I
8 would say it was around the first of November when it
9 actually came to my attention.

10 Q Okay. And do you recall how it came to your
11 attention?

12 A I found it in a file.

13 Q And what was it that occasioned -- you know,
14 what was it that caused you to look through a file
15 which you came upon this letter?

16 A Because of the telephone calls.

17 Q Now who had custody of the files, or who was
18 maintaining the files that you were looking at?

19 A Mr. Baggett had -- it was in his office.

20 Q Now was Mr. Baggett still at the radio
21 station at the time you were looking through the files?

22 A Yes.

23 Q When you got the letter, what did you do?

24 A What did I do? I asked Mr. Baggett about it,
25 and he took it to Mr. Abernathy, which was then the

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 station manager.

2 Q Okay. Mr. Abernathy was the station
3 engineer? Correct?

4 A An engineer. Yes, I'm sorry.

5 Q Now did you read the letter?

6 A Yes.

7 Q Did you have any discussion with Mr. Baggett
8 about the contents of the letter?

9 A Mr. Baggett said that he didn't know what to
10 do. He was not familiar with it, and neither was I, so
11 he took it to Mr. Abernathy.

12 Q And what was the result of that?

13 A I don't know.

14 Q Okay.

15 A I did not get a report back from Mr.
16 Abernathy, and Mr. Baggett did not give me a report
17 from Mr. Abernathy's, of what transpired.

18 Q Did there come a time when you found out what
19 did happen?

20 A I found -- let's see. Let me stop and think
21 now. The letter from Mr. Denton through the FCC. He
22 said that Mr. Abernathy had came out to his home. And
23 also Randy Soens said that Mr. Abernathy had came out
24 to his home.

25 Q Now looking at the letter, the October 21

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 letter from the Commission, it states in the second
2 paragraph, "I am sending you two letters that we have
3 received," etc.

4 A Uh-huh.

5 Q Now in looking through this, I don't see any
6 letters, do you? I mean, do you know what letters are
7 being referred to here?

8 A Dairrel Denton, Randy Soens.

9 Q Okay. So Denton and Soens are the two
10 letters that are referred to here?

11 A Yes.

12 Q And at the time you read those letters?

13 A Yes.

14 Q Okay. And is the Denton letter the one that
15 you are referring to that mentions a visit from Mr.
16 Abernathy?

17 A Yes. No, not the Denton letter, no. That
18 letter to the FCC was just complaining of FM
19 blanketing.

20 Q Okay. Now I would like to direct your
21 attention to Mass Media Exhibit No. 4, page 7.

22 A Page 7?

23 Q Now have you seen this letter before?

24 A Yes.

25 Q Was this the letter that was included with

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 the October 21 Commission letter?

2 A Yes.

3 Q Okay. And did you read through Mr. Denton's
4 letter?

5 A Yes.

6 Q Okay. Now do you see the second paragraph of
7 that letter?

8 A Yes.

9 Q Can you read it for us, please?

10 A "As of yet, they continue to eliminate all TV
11 reception except for the local Poplar Bluff channel.

12 Q Okay. Do you understand from that sentence
13 that there is something more than just Channel 6
14 involved here?

15 A Probably I didn't at the time. No, but it
16 says that there, doesn't it?

17 Q Well, at this point I am just asking for your
18 understanding of that.

19 A Uh-huh. He did not mention any channels
20 whatsoever. He just said all TV except for the local
21 Poplar Bluff channel. He did not mention any channels.

22 Q Now by "the local Poplar Bluff channel," did
23 you understand that he was referring to Channel 15?

24 A I would assume, yes.

25 Q And by "all other TV reception," what is he

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 | referring to?

2 | A I have no idea of what stations Mr. Denton
3 | picked up.

4 | Q Now during the first couple of weeks of, you
5 | know, KOKS's operations, do you recall approximately
6 | how many times you had occasion to speak with Mrs.
7 | Smith?

8 | A No, I do not.

9 | Q It was more than once, though, wasn't it?

10 | A I would say more than once.

11 | Q In fact, she was like a regular caller to the
12 | station in a way?

13 | A Yes.

14 | Q Calling to complain about her TV reception?

15 | A Yes.

16 | Q Did you ever have occasion to tell Mrs. Smith
17 | that you were working on the interference problem?

18 | A I don't know. Let me think a minute. I
19 | might have told her that we were trying to find a
20 | filter that would work on the interference problem. I
21 | don't recall exactly what I said to Mrs. Smith.

22 | Q Now I would like you to turn to Mass Media
23 | Exhibit 2. If you can't find it, I will help you find
24 | it.

25 | A That's fine.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947